

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

<b>IN RE BLUE CROSS BLUE SHIELD ANTITRUST LITIGATION MDL 2406</b>	: : <b>Master File 2:13-cv-20000-RDP</b> : : : : <b>This document relates to</b> : <b>Subscriber Track cases</b>
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**JOINT STIPULATION REGARDING THE PROPOSED  
SUPPLEMENTAL NOTICE TO SELF-FUNDED ACCOUNTS**

Subscriber Plaintiffs and Settling Defendants (collectively, the “Settling Parties”) respond to the Court’s request for confirmation that the Second Blue Bid relief reflected in Paragraph 15 of the Settlement Agreement is divisible injunctive relief under Federal Rule of Civil Procedure 23(b)(3). The Settling Parties jointly agree that the Second Blue Bid relief is divisible injunctive relief under Federal Rule of Civil Procedure 23(b)(3) and the Settlement Agreement.

Accordingly, if the Court grants Subscriber Plaintiffs’ Motion for Supplemental Notice to Self-Funded Accounts, the Settling Parties agree to include the additional language below in the proposed Supplemental Notice:

The Settling Parties jointly agree that the Second Blue Bid relief reflected in Paragraph 15 of the Settlement Agreement is divisible injunctive relief under Federal Rule of Civil Procedure 23(b)(3) and the Settlement Agreement.

Settlement Class Counsel will also cause a copy of this stipulation to be posted to the settlement website.

Date: January 27, 2022

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 27, 2022, the foregoing was filed with the Clerk of the Court and served on counsel of record via ECF.

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